

## Potential Issues/Questions to Discuss with Ecology

### Debarker/Chipper Project

- The application did not include isopleth maps of the modeling results. It is the Tribe's understanding plots of maximum modeled results are typically included in air permit applications. These maps are crucial for helping the Tribe evaluate the portions of the Reservation that may have a deterioration in air quality due to the proposed project.
- In Section 6.8 of the permit application the project-specific maximum modeled impacts were compared against the SILs for PM10 and PM2.5. It is understood an expanded ambient standard compliance demonstration ("expanded modeling") was needed because the project-specific modeling ("initial modeling") demonstrated modeled impacts greater than the SILs. It was noted the design concentrations in the expanded modeling were lower than the maximum concentrations from the initial modeling, despite the inclusion of full facility emissions. It is counter-intuitive the results from the expanded modeling would be less than the results from the initial modeling, given the inclusion of the full facility emissions. After interpretation of footnote #1 of Table 6-10 it was understood the design concentrations for the expanded modeling are determined differently than the maximum concentrations from the initial modeling. The Tribe would be interested in a more thorough discussion of these differences and would suggest an expanded discussion be included in the permit application to help the public understand these differences.

### Existing Facility

- Facility PTE for VOC – The current VOC PTE of the facility is shown as 247.5 tons per year and that doesn't include the PTE of the Nebraska boiler. The only limit on PTE in the facility's permit is a limit on the TMP mill pulp production of 598 oven-dried metric tons, (calculated at zero % moisture) pulp per day on an annual average basis. No other emission unit has a PTE limit. And it appears that some/all of the methanol emissions from WWT are not included in VOC PTE. Given these facts, it isn't clear that this facility is a PSD minor source. How is Ecology ensuring that facility is in fact not a PSD major source?
- A review of the past permitting record for the existing facility doesn't show that NO2 NAAQS compliance has ever been demonstrated. NO2 It is the only other NAAQS pollutant with PTE over the Title V major source threshold and a demonstration that the 1-hour NO2 NAAQS is not being exceeded, especially within the Reservation, would be appropriate.